

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 Robert.Freeman@lewisbrisbois.com
NOEL E. EIDSMORE
3 Nevada Bar No. 7688
Noel.Eidsmore@lewisbrisbois.com
4 6385 S. Rainbow Boulevard, Suite 600
Las Vegas, Nevada 89118
5 702.893.3383
FAX: 702.893.3789
6 Attorneys for Defendant
Bonnie Polley
7

8 UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF NEVADA

10 ***

11 ABDUL HOWARD,

12 Plaintiff,

13 vs.

14 BONNIE POLLEY, CLARK COUNTY
DETENTION CENTER, SHERIFF
15 LOMBARDO, ET AL., (JOHN DOE) #
M4707A, PEGGY E. MARTINEZ # FSD
16 ARH 002, THE STATE OF NEVADA

17 Defendants.

CASE NO. 2:15-cv-1458-APG-VCF

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR FILING
THE DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION RE LIBEL &
SLANDER (ECF # 61) AND PLAINTIFF'S
MOTION RE HIPPA VIOLATION
(ECF#63)**

First Request

18
19 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
20 record, hereby stipulate and request that this Court extend the deadline for Defendants to file a
21 Response to Plaintiff's Motion re Libel & Slander (ECF #61) and Plaintiff's Motion to the Court
22 that Defendants Violated the HIPPA Act (ECF #63) in the above-captioned case, currently due
23 November 3, 2017, for ten (10) days, up to and including November 13, 2017.

24 This Request for an extension of time is not sought for any improper purpose or other
25 purpose of delay. This request for extension is based upon the following:

26 Counsel for Defendant needs additional time to complete Defendants' Responses to
27 Plaintiff's motions in this matter, as he has been preparing for and attending depositions the week
28 of October 30, and completing a summary judgment motion in *Banner v. LVMPD*, 2:16-cv-1717-

1 RFB-CWH, due on November 6, 2017.

2 WHEREFORE, the parties respectfully request that this Court extend the time for the
3 Defendants to file their responses to Plaintiff's motions by ten (10) days from the current deadline
4 of November 3, 2017 up to and including November 13, 2017.

5 DATED this 1st day of November, 2017. DATED this 1st day of November, 2017.

6 LEWIS BRISBOIS BISGAARD & SMITH MORRIS LAW GROUP

7
8 /s/ Noel E. Eidsmore

9 Robert W. Freeman, Jr., Esq.
10 Nevada Bar No. 3062
11 Noel E. Eidsmore, Esq.
12 Nevada Bar No. 7688
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendant
Bonnie Polley

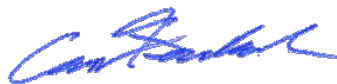
/s/ Akke Levin

Akke Levin, Esq.
Nevada Bar No. 9102
Ryan M. Lower, Esq.
Nevada Bar No. 9108
411 E. Bonneville Avenue
Suit 360
Las Vegas, Nevada 89101
Attorneys for Plaintiff

13
14 **ORDER**

15 IT IS SO ORDERED.

16 Dated this 2nd day of November, 2017.

17
18 

19
20
21
22
23
24
25
26
27
28

U.S. MAGISTRATE JUDGE